

ROSS & SMITH, PC

Judith W. Ross
State Bar No. 21010670
Frances A. Smith
State Bar No. 24033084
Eric Soderlund
State Bar No. 24037525
700 N. Pearl Street, Suite 1610
Dallas, Texas 75201
Telephone: 214-377-7879
Facsimile: 214-377-9409
Email: judith.ross@judithwross.com
frances.smith@judithwross.com
eric.soderlund@judithwross.com

*Counsel for Mary Kathryn Lucas (néé Irving),
John Paul Sevilla, Scott Ellington, Isaac Leventon,
and Matthew DiOrio*

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

IN RE:	§ Chapter 11
HIGHLAND CAPITAL MANAGEMENT, L.P.,¹	§ Case No. 19-34054-sgj-11
Debtor.	§ Chapter 11
UBS SECURITIES LLC AND UBS AG	§ Adversary Proceeding
LONDON BRANCH,	§ No. 21-03020-sgj
Plaintiffs,	§
VS.	§
HIGHLAND CAPITAL MANAGEMENT, L.P.,	§
Defendant.	§

¹ The Debtor's last four digits of its taxpayer identification number are (6725). The headquarters and service address for the above-captioned Debtor is 300 Crescent Court, Suite 700, Dallas, TX 75201.

**NOTICE OF INTENT TO TAKE WITNESS TESTIMONY OF CORPORATE
REPRESENTATIVE OF UBS SECURITIES LLC AND UBS AG LONDON BRANCH**

PLEASE TAKE NOTICE that, pursuant to Rule 9014 of the Federal Rules of Bankruptcy Procedure and Local Rule 9014-1, Mary Kathryn Lucas (neé Irving), John Paul Sevilla, Scott Ellington, Isaac Leventon, and Matthew DiOrio (collectively, the “**Former Employees**”) shall take the testimony of the Corporate Representative of UBS Securities LLC and UBS AG London Branch (together, “**UBS**”), at the hearing currently set for **June 24, 2021 at 2:30 PM** on the following:

1. The allegations and contentions set forth in the following documents filed with the Court:
 - (a) Motion of Former Employees to Quash Subpoenas and Brief in Support [Docket No. 70];
 - (b) Plaintiffs’ Motion to Compel and Response to Motion of Former Employees to Quash Subpoenas and Brief in Support [Docket No. 74];
 - (c) Original Complaint for Injunctive Relief [filed under seal]; and
 - (d) Order Granting Plaintiffs’ Motion for a Temporary Restraining Order [Docket No. 21].
2. The Settlement Agreement dated March 30, 2021 by and between UBS and the Debtor (Ch. 11 Docket No. 2200 at Ex. 1), in particular the negotiation and drafting of §§1(c) and 3(a) thereof.

Dated: June 17, 2021

Respectfully Submitted,

By: /s/ Frances A. Smith
Judith W. Ross
State Bar No. 21010670
Frances A. Smith
State Bar No. 24033084
Eric Soderlund
State Bar No. 24037525
ROSS & SMITH, PC
700 N. Pearl Street, Suite 1610
Dallas, Texas 75201
Telephone: 214-377-7879
Facsimile: 214-377-9409
Email: judith.ross@judithwross.com
frances.smith@judithwross.com
eric.soderlund@judithwross.com

**COUNSEL FOR MARY KATHRYN LUCAS
(NEÉ IRVING), JOHN PAUL SEVILLA,
SCOTTELLINGTON, ISAAC LEVENTON,
AND MATTHEW DIORIO**

CERTIFICATE OF SERVICE

I hereby certify that on June 17, 2021, a true and correct copy of the foregoing was served via ECF-Electronic Notice on all parties receiving ECF-Notice in this adversary proceeding.

/s/ Frances A. Smith
Frances A. Smith